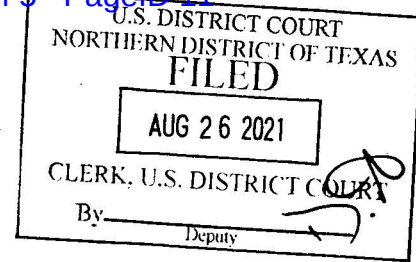


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION



UNITED STATES OF AMERICA

v.

ERFAN SALMANZADEH

No. **2-21-CR-066-Z**

INDICTMENT

The Grand Jury Charges:

Count One

Making and Possessing an Unregistered Destructive Device  
(Violation of 26 U.S.C. §§ 5861(d), 5861(f), and 5871)

On or about July 26, 2021, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Erfan Salmanzadeh**, defendant, knowingly made and possessed a firearm, as that term is defined in 26 U.S.C. § 5845(f), that was, and could readily have been put in, operating condition, that is, a destructive device, not registered to him in the National Firearms Registration and Transfer Record, defendant knowing the characteristics of said firearm.

In violation of Title 26, United States Code, Sections 5861(d), 5861(f), and 5871.

Count Two

**Making and Possessing an Unregistered Destructive Device**  
(Violation of 26 U.S.C. §§ 5861(d), 5861(f), and 5871)

On or about July 26, 2021, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Erfan Salmanzadeh**, defendant, knowingly made and possessed a firearm, as that term is defined in 26 U.S.C. § 5845(f), that was, and could readily have been put in, operating condition, that is, a destructive device, not registered to him in the National Firearms Registration and Transfer Record, defendant knowing the characteristics of said firearm.

In violation of Title 26, United States Code, Sections 5861(d), 5861(f), and 5871.

Count Three

Making and Possessing an Unregistered Destructive Device  
(Violation of 26 U.S.C. §§ 5861(d), 5861(f), and 5871)

On or about July 26, 2021, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Erfan Salmanzadeh**, defendant, knowingly made and possessed a firearm, as that term is defined in 26 U.S.C. § 5845(f), that was, and could readily have been put in, operating condition, that is, a destructive device, not registered to him in the National Firearms Registration and Transfer Record, defendant knowing the characteristics of said firearm.

In violation of Title 26, United States Code, Sections 5861(d), 5861(f), and 5871.


Forfeiture Notice  
(26 U.S.C. § 5872)

Upon conviction of any offense alleged in this indictment and pursuant to 26 U.S.C. § 5872, defendant **Erfan Salmanzadeh** shall forfeit to the United States of America any firearm and ammunition involved in or used in the knowing commission of the offense including, but not limited to, three destructive devices and all components, accessories, and other materials used to make those devices.

A TRUE BILL:

  
FOREPERSON

PRERAK SHAH  
ACTING UNITED STATES ATTORNEY

  
JOSHUA FRAUSTO  
Assistant United States Attorney  
Attorney-in-Charge  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

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THE UNITED STATES OF AMERICA

v.

ERFAN SALMANZADEH

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INDICTMENT

COUNTS 1-3:

MAKING AND POSSESSING AN UNREGISTERED  
DESTRUCTIVE DEVICE  
Title 26, United States Code, Sections 5861(d), 5861(f), and  
5871.

FORFEITURE NOTICE  
(3 COUNTS)

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A true bill rendered:  
Amarillo

Filed in open court this 26<sup>th</sup> day of August, A.D. 2021.

Jane Sparr Foreperson

Clerk

ARREST WARRANT TO ISSUE  
(Complaint filed 7/30/2021 – 2:21-MJ-116)

Dee Ann Reno  
UNITED STATES MAGISTRATE JUDGE